

FILED 16 OCT '24 12:42 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:24-cr-00398-IM

v.

INDICTMENT

SUMMER BREEZE WAFFORD,

18 U.S.C. § 641

Defendant.

THE GRAND JURY ATTORNEY CHARGES:

**COUNT 1
(Theft of Government Funds)
(18 U.S.C. § 641)**

Between on or about November 1, 2013, and continuing through on or about December 31, 2023, in the District of Oregon, defendant SUMMER BREEZE WAFFORD did knowingly and willfully steal and convert to her own use or the use of another, money of the United States Social Security Administration, a department and agency of the United States, to wit: by

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receiving and using Title II benefits payments in an approximate amount of \$122,499.00, based on fraudulent representations and concealments;

All in violation of Title 18, United States Code, Sections 641.

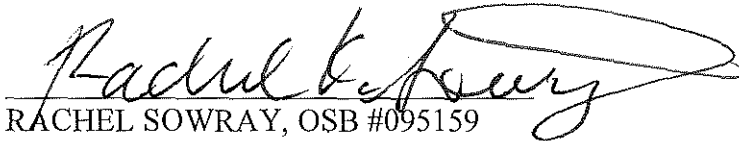
Dated: October 16, 2024

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT
United States Attorney


RACHEL SOWRAY, OSB #095159
Special Assistant United States Attorney